

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :
v. :
CRAIG ALEX LEVIN : **CRIMINAL DOCKET NO. 2:19-cr-00728-1**
: **HONORABLE HARVEY BARTLE, III**

SENTENCING MEMORANDUM

The Defendant, Craig Alex Levin, is scheduled for sentencing on May 9, 2023 for numerous counts of interstate and foreign illicit sexual conduct with a minor and distribution of child pornography. This Memorandum is being submitted on behalf of the Defendant prior to the imposition of sentence.

1. History and Characteristics of Defendant

Defendant is sixty-seven years old and has never had any prior contacts with the criminal justice system. He has lived all these years as a productive and positive person in the community. Mr. Levin has been married twice with two sons from his first marriage. Mr. Levin, by all accounts, was an excellent father who provided for his children both financially and emotionally. Mr. Levin maintains a close relationship to his children up to the present time.

Mr. Levin is a very educated individual who graduated Penn State with a degree in special education and earned a masters degree in elementary education from the University of Hawaii.

This extensive education led to a lengthy career as a special education teacher and administrator in the Lower Merion School District.

In summary then, Mr. Levin's history and characteristics are of an educated sixty-seven year old man, never arrested, always worked in a difficult profession and was an excellent father

and provider. (See attached history from Mr. Levin - Exhibit A)

2. Nature and Circumstances of Offense

The crime of conviction is obviously serious and significant. However, the context of this activity must be considered in its totality. The sexual activity by the Defendant was not illegal in the Philippines. Until March of 2022 the age of consent was twelve years and now sixteen years. The girls were never coerced, tricked or lied to in order for the sexual activity to take place. In the Philippines there was never a single accusation or complaint against Mr. Levin because what he was doing was not considered a crime in the Philippines. No girl was ever forced and each was treated with respect and monetary benefit. Many of the times he was invited to the girls homes to meet the parents.

Although the Defendant is facing child pornography charges he never purchased, collected, shared or asked for child pornography.

In summary then, this life style chosen by the Defendant, if done in the United States, would be viewed in a horrific way but in the Philippines is simply not out of the norm.

A. Seriousness of Offense and Promoting Respect for the Law: As previously stated this crime is clearly serious but it must be put in context and perspective as discussed.

B. Deterrence: Deprivation of liberty for a significant period of time for a sixty-seven year old man would clearly send a strong message to anyone else contemplating engaging in such activity. Fifteen years incarceration is hardly a slap on the wrist that would not deter others.

C. Public Protection: As was previously noted, Mr. Levin never had any issues in all his many years in the United States. The unique situation of the law and custom of the

Philippines created this crime.

If Mr. Levin is kept from the Philippines, history tells us there is no public protection risk at all.

D. Vocational and Medical Needs: The Defendant at his age and based on his work history is not in need of any vocational assistance. However, Mr. Levin has suffered his entire life with Pulmonary Stenosis and has long been a patient at Deborah Heart and Lung Center in Browns Mills, New Jersey.

3. Other Factors

A. Victims in the case have written letters and videos indicating the consensual nature and good relationship with Mr. Levin and the manner in which they encountered Mr. Levin as being friendly and respectful (see previous affidavits and attached English translations - Exhibit B)

B. Incarceration in Philippines was brutal and inhumane. Defendant spent almost nine months in a disgusting, cockroach infested horrific Philippine penal colony, five hundred in a jail designed for one hundred twenty. This institution was so bad it was subject to a BBC documentary called “Manilla Grilag.”

C. Support letters: Attached as Exhibit C are letters of support for Mr. Levin.

CONCLUSION

Mr. Levin’s history is one of a dedicated public servant with special education children, an excellent father and caring and compassionate person. The life style he led in the Philippines was one he engaged in due to its local legality. He was a proud teacher, coach, administrator and father.

Due to the nature of the Plea Agreement, fifteen years is the minimum of the agreed upon range. Fifteen years, based on all of the above, for a sixty-seven year old man is clearly sufficient but not more than necessary to achieve sentencing goals.

Respectfully submitted,

Date: April 12, 2023

Jack McMahon
Jack McMahon
Attorney for Defendant
Craig Alex Levin

CERTIFICATE OF SERVICE

The undersigned hereby certify that on this date a copy of the foregoing Sentencing Memorandum was served by way of the Court's electronic case filing system and electronic mail upon the following:

Honorable Harvey Bartle, III
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for the Eastern District of Pennsylvania
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Date: April 12, 2023

/s/ Jack McMahon

Jack McMahon